



The University of Oklahoma Outreach

Norman, Oklahoma 73019-2034

April 28, 2008

Marlene H. Dortch
Secretary, Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of Broadcast Localism, MM Docket NO. 04-233

Dear Ms. Dortch:

The University of Oklahoma owns KGOU at 106.3 FM to serve Cleveland County and KROU at 105.7 FM to serve Oklahoma County. In addition, the University also owns translators in Seminole, Oklahoma and Ada, Oklahoma, and is pursuing other frequencies to expand service to Oklahomans without public radio service. Each week, nearly 60,000 listeners choose KGOU in central Oklahoma.

Although both KGOU and KROU operate on commercial frequencies, the stations are licensed as non-commercial educational public radio stations. The stations operate as a network with KGOU as the lead station and KROU as a satellite (repeater) station with a main studio waiver. The University operates these stations to provide quality information and entertainment for our audience that adhere to the highest journalistic standards with a mixture of national, regional and local programming designed to engage listeners, enhance the quality of life, and meet the diverse needs of people in our local service area.

We believe that our ability to serve our local communities will be seriously compromised if public radio stations are required to operate under the localism provisions in Docket No. 04-233.

I. Community Roots

KGOU, as a non-commercial educational radio entity, is inherently local.

- As a non-profit station licensed to a public university, our mission is to serve the educational, informational, and cultural needs of our local communities.
- KGOU staff gathers information about community needs through a variety of mechanisms, including "From the Manager's Desk" weekly feature, a listener Comment line, and regular referral to the station's web page and email address for comments, surveys of listeners, and regular contact with community leaders and organizations. In addition, many of the KGOU staff members are active within the community, serving on cultural and civic organizations, tribal affairs, and other activities.
- KGOU's continued success and viability is without question dependent on individual listeners in our community voluntarily deciding to make significant financial contributions to this service.

II. Community Service

KGOU provides sustained and significant local public service, using available resources in the most efficient manner consistent with public service.

- KGOU provides public service through a mix of programming produced locally and programming

obtained from regional and national producers. The service features news and public affairs, political coverage, and local arts and cultural news and entertainment.

- KGOU incorporates local, daily news coverage into material from NPR and other sources. These include local newscasts updated several times per hour during morning and evening drive time and over the noon hour. In addition, in-depth local feature reports several times a week are provided by the news staff, often heard in both morning and evening drive. KGOU also presents an hour of Oklahoma content each Monday at 11am. The daily program schedule includes a minimum of a minute per hour for free community calendar announcements to provide promotion for the non-profit cultural, civic and social organizations in our communities.
- In the last three years KGOU has received over 35 awards for local news coverage from the Oklahoma Associated Press, Oklahoma Society of Professional Journalists, the Oklahoma Broadcasters Association and others.
- KGOU uses the web site to supplement and augment our over-the-air program services. KGOU streams -the-air programming via the web site for the benefit of those who are better able to access our services by that means. The station's local news and public affairs stories, and local community calendar events are archived on the web page for access by listeners at any time, and some of these are extended versions of what was broadcast. KGOU also uses the web page to host web-only content for the audience.
- The University of Oklahoma has one Construction Permit to build a new station in Ada, Oklahoma, extending service to over 22,000 potential listeners, as a result of the October 2007 filing window, and have 2 other applications for Construction Permits pending. These will significantly enhance our ability to bring local service to under-served and unserved regions.
- In addition to our full-time staff, KGOU hires a number of part-time students from The University of Oklahoma for a variety of tasks in operations, fundraising and programming. KGOU also host interns from the OU School of Journalism.

III. Increased Regulatory Burden

Far from serving and enhancing localism, measures in the proposed rulemaking would have a deleterious effect.

- The FCC's goal of enhancing localism will be best served by maintaining the existing flexibility KGOU has to serve the needs and interests of our listeners.
- Requiring each station to maintain a main studio in its community of license and the presence of station personnel during all times of operation would force The University of Oklahoma to hire additional personnel, rent studio space for a main studio for KROU, plus purchase broadcast and interconnection equipment to meet the requirement. This will divert scarce resources from the current local service to these new obligations. Such a burden would affect not only our current main license but the new stations The University expects to construct.
- If these changes are adopted, KGOU may well have to reduce the hours of operation or consider abandoning the extent of news coverage throughout the region and the number of hours devoted to local program content.
- As an automated station, the KGOU staff has utilized technology to maximize staff responsiveness to such things as breaking news and severe weather. For example, as a participant in the Oklahoma Amber Alert Program, missing children alerts automatically are broadcast, as are EAS tests and alerts, and severe weather advisories. KGOU staff can change programming via their home computers or phone web browsers in response to such needs. The KGOU staff has a system, both technological and human, to monitor the station's operations to know when there is a problem.
- Likewise, imposing mandatory minimum program origination obligations, enhanced disclosure

requirements, and new license renewal processing guidelines will increase our administrative costs at a time when KGOU is already under-resourced and increasingly stretched thin financially.

IV. SUMMARY

Therefore, in the interest of localism itself, we urge the FCC in the strongest possible terms to exempt public radio stations from any of the proposed new regulatory burdens.

- Please consider that educational public radio stations such as KGOU is locally owned, staffed and programmed by people who live in the communities they serve. KGOU's very existence is dependent upon being able to provide an appropriate mix of local, regional and national programming tailored to the needs of our community and region.
- These regulations will carry with them the unintended consequence of making it more difficult for stations that are already beacons of localism to continue to serve in that capacity.

Sincerely,

Karen Holp /s/

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